

# DEPARTMENT OF THE AIR FORCE HEADQUARTERS UNITED STATES AIR FORCE WASHINGTON DC

Oction: 72 ABW/CC

OCT 1 | 2000

#### MEMORANDUM FOR ALMAJCOM-FOA-DRU/SC/PA/JA

FROM: HQ USAF/SCT

1250 Air Force Pentagon Washington DC 20330-1250

SUBJECT: Guidance for Implementation of Congressionally-Mandated Requirements

Concerning Access to Federal Information Technology by Members of the Public

and Federal Employees with Disabilities

Section 508 of the Rehabilitation Act Amendments of 1998 requires Federal information technology be equally accessible to both disabled and non-disabled Federal employees and members of the public. Failure to meet Section 508 requirements could result in administrative claims and lawsuits against the Air Force. The effective date for compliance with the requirements of this law, "six (6) months after the date of publication by the Access Board of the final Standards document," is now projected to be May 2001. This memo provides initial guidance concerning the two major areas impacted by the law—web page accessibility and equipment/software accessibility.

Web page accessibility to publicly accessible sites: GSA has recommended each agency ensure its principal web site, and the next 20 most popular public sites by volume of use, are accessible to persons with disabilities. The Air Force considers AFLINK (www.af.mil) to be its official public access point. The AFLINK page is now accessible. In response to the next 20 most popular site challenge, we request that each MAJCOM review its main MAJCOM public page for handicap accessibility. The GSA Center for Information Technology Accommodation (CITA) has provided Web guidelines similar to those that may be expected in the final Standards as well as a list of some available resources that may assist with this process. We request you use the suggested guidance at <a href="http://www.itpolicy.gsa.gov/CITA">http://www.itpolicy.gsa.gov/CITA</a> in conducting this review. There is also a public domain "Tool Site" that will allow you to test your site against these guidelines. It is called "Bobby" and is accessible at <a href="http://www.cast.org">http://www.cast.org</a>.

The July 21, 2000 DoD-CIO memo (attached) also contains recommendations for the Services and agencies to follow in complying with Section 508 of the Rehabilitation Act Amendments of 1998. We request addressees respond to the specific tasks on the following schedule.

### By 17 Nov 2000:

- a. MAJCOMs identify to AF/SCT the site you have designated as your principal public access point;
- b. If applicable, all other addressees identify to AF/SCT the site you have designated as your principal public access point; and

c. Each addressee assign a point of contact for Section 508 matters and provide name and contact information to AF/SCT. These individuals should be of similar rank and expertise to those previously assigned to work Y2K issues.

### By 1 Dec 2000:

Section 508 POCs run all of their web site addresses through the "Bobby" tool and report the resultant pass/fail condition and the associated address to the "afscta@af.pentagon.mil" mailbox.

## By 22 Dec 2000:

- a. Each addressee who designated a principal public access point will ensure that the Web site is compliant;
- b. For those web sites designated as principal public access points, provide text equivalents for each non-text element, making meaning independent of color used;
- c. Incorporate proposed requirements (at 1194.23(c) of the GSA CITA handout attached to the DoD-CIO memo) into each site's guide for web page development; and
- d. Update local web-site-administration procedures to establish/include checks to ensure accessibility of new and updated pages prior to posting.

### By 2 Mar 2001:

- a. As specified in the DoD-CIO memo, each MAJCOM develop and execute a plan for remediation and compliance testing; and
  - b. Each addressee complete the task of bringing their web sites into compliance.

Equipment/software accessibility: Section 508 requires EIT commercial products acquired after the effective date to comply with standards providing access for people with disabilities. The extent of the requirement is unclear at this time, and industry is still working with government agencies in providing comment concerning the draft standards. In the interim, if you acquire electronic and information technology (EIT) that can reasonably be expected to be accessed by non-disabled individuals, you need to ensure your EIT contract actions, such as requests for proposals, invitations for bids, and contract documents, incorporate language addressing the requirements for access for users with disabilities. You should also ensure instructions are available that will assist people with disabilities in obtaining alternative EIT services. Because the new law permits members of the public and Air Force employees to file administrative claims or lawsuits for non-compliance, you should promptly coordinate any Section 508 complaint with your personnel and legal offices. Also provide notification of such Section 508 actions to AFCA/JA, SAF/PA, and AF/SCT.

Initial consultant assistance is available through the Computer/Electronic Accommodation Program (CAP) at the Pentagon. CAP provides assistive technology and accommodation to persons with disabilities at the DoD, at no cost to individual activities. CAP's mission is to ensure people with disabilities have equal access to the information environment and opportunities in DoD. CAP supports electronic accessibility efforts, including Section 508

requirements and provides demonstrations and evaluations of assistive technology at the CAP Technology Evaluation Center (CAPTEC) at the Pentagon. The CAP point of contact is Ms. Dinah F.B. Cohen, Director. Ms. Cohen can be reached at: Dinah.Cohen@tma.osd.mil or 703-681-3976. You may also find additional information on the CAP web site www.tricare.osd.mil/cap

Because of the sweep of this new law and the fact implementing standards are still being worked, this guidance is necessarily general in nature. The Air Force has been a leader in ensuring access to Information Technology resources for both disabled members of the public and our own employees. We need to ensure we continue this progress with a planned, uniform implementation of Section 508 standards when published. Please do not hesitate to contact us with any questions or suggestions. Our point of contact is Mr. Wayman I. Braxton, HQ USAF/SCTAA, DSN 425-6156; wbraxton@af.pentagon.mil.

William Phelm

WILLIAM P. NELSON, Colonel, USAF Director, Architecture and Interoperability DCS/Communications and Information

Attachment: DoD CIO Memo, July 21, 2000

cc:
HQ USAF/SC/XP/XO/JA
HQ USAF/SCT/SCM
ALMAJCOM-FOA/AQ/FM/DP/SG
OSAF/AQ/FM/PA/DP/AA/AQI/PAI
AFPEO/AT/JA/WS/FB/BA/JL/SP/WP
OC-ALC/CC; ESC/CC; HSC/CC
SMC/CC; OO-ALC/CC; SA ALC/CC
WR-ALC/CC; SM-ALC/CC; ASC/CC